



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EMN
F.#2008R01634

271 Cadman Plaza East
Brooklyn, New York 11201

June 23, 2011

By ECF

All Counsel of Record

Re: United States v. Vernace, et al.
Criminal Docket No. 11-005 (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government furnishes the following discovery in the above-referenced case. The government requests reciprocal discovery from the defendants.

The discovery listed below is being forwarded to First Choice Copy (Jagg Management), order number **60041**. You may access these materials by calling Joe Meisner, who can be reached at the following telephone number: (718) 381-1480, ext. 212.

Discovery Exhibit #	Bates Range	Description
19	000678-004575	Miscellaneous documents from the NYPD and Queens County District Attorney files relating to the John D'Agnese and Richard Godkin murders
20	004576-004591	Cafe Love, Inc. New York State corporate records
21	004592-004817	Flipper Realty LLC financial records
22	-	Title III recordings from 69-44 Cooper Avenue, Glendale, New York (2009), which may include oral statements of the defendants
23	004818-004927	Miscellaneous surveillance photographs <ul style="list-style-type: none"> • 5/23/80 • 6/27/80 • 7/20/88

24	004928-004982	69-44 Cooper Avenue Property Records
25	004983-004997	Miscellaneous surveillance photographs and videos <ul style="list-style-type: none"> • Video compilation (2010, 2011) • 9/9/10 (photographs) • 11/22/10 (photographs)
26	004998-004999	Postcard
27	005000-005005	New York Daily News articles (4/12/81, 4/13/81) ¹
28	005006-005016	Cafe Love, Inc. Delaware corporate records

Please let us know if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Evan M. Norris
Stephen E. Frank
Assistant U.S. Attorneys
(718) 254-6376/6143

cc: Clerk of Court (SLT) (by ECF)

¹ The government is in possession of physical copies of The New York Daily News for April 11, 12 and 13, 1981, and The New York Post for April 11 and 13, 1981, all of which can be inspected at a mutually agreeable time. The only articles relating to the Godkin and D'Agnese homicides in the foregoing newspapers are those included in Discovery Exhibit 27.